

**REQUIRED STATEMENT
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) William A. Hubble Kimberly M Hubble Case No. 20-18862 Chapter 13

WILMINGTON TRUST COMPANY AS SUCCESSOR
TRUSTEE TO THE BANK OF NEW YORK AS SUCCESSOR
TRUSTEE FOR JPMORGAN CHASE BANK, N.A., AS
TRUSTEE FOR THE BENEFIT OF THE
CERTIFICATEHOLDERS OF POPULAR ABS, INC.
MORTGAGE PASS-THROUGH CERTIFICATES SERIES

All Cases: Moving Creditor 2005-5 Date Case Filed 10/18/20

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☒ Other (describe) Dismissal

Chapter 13: Date of Confirmation Hearing 05/07/2021 or Date Plan Confirmed _____

Chapter 7: ☐ No-Asset Report Filed on _____
☐ No-Asset Report not Filed, Date of Creditors Meeting _____

1. Collateral
 - a. ☒ Home
 - b. ☐ Car Year, Make, and Model _____
 - c. ☐ Other (describe) _____
2. Balance Owed as of 04/09/2021 \$185,157.33
Total of all other Liens against Collateral \$45,002.00
3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.
4. Estimated Value of Collateral (must be supplied in *all* cases) \$280,666.00, per Debtors Schedules
5. Default
 - a. ☒ Pre-Petition Default as of petition date
Number of months 3 Amount \$8,232.70
 - b. ☒ Post-Petition Default
 - i. ☒ On direct payments to the moving creditor
Number of months 3 Amount \$6,658.60
 - ii. ☐ On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount _____
6. Other Allegations
 - a. ☒ Lack of Adequate Protection § 362(d)(1)
 - i. ☐ No insurance
 - ii. ☐ Taxes unpaid Amount \$ _____
 - iii. ☐ Rapidly depreciating asset
 - iv. ☐ Other (describe) _____
 - b. ☐ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
 - c. ☐ Other "Cause" § 362(d)(1)
 - i. ☐ Bad Faith (describe) _____
 - ii. ☐ Multiple Filings
 - iii. ☐ Other (describe) _____
 - d. Debtor's Statement of Intention regarding the Collateral
 - i. ☐ Reaffirm
 - ii. ☐ Redeem
 - iii. ☐ Surrender
 - iv. ☒ No Statement of Intention Filed

Date: April 26, 2021

(Rev. 12/21/09)

/s/ Terri M. Long

Counsel for Movant